

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

UNITED STATES OF AMERICA)
v.) No. 3:20-CR-00021
ANMING HU)
)

MOTION FOR ADDITIONAL TIME TO FILE MOTIONS

Now Comes the Defendant Anming Hu and moves this Honorable Court to extend the Defendant's Motion cutoff from June 15th to July 6th, 2020.

The Court has already ruled this is a complex case. Many facts are relevant and the Government's investigation extends several years. There is a large amount of Discovery that has already been produced in this case. Additional Discovery was provided as late as mid-May.

Trial in this case is scheduled for December 1, 2020.

At the present time there are pending procedures under the Classified Information Procedures Act and which will extend into at least August.

The Government has been advised of the Defendant's request for additional time and the Government has no objection to extending the Motion cutoff date to July 6th.

The interest of justice will best be served by an extension of time until July 6th.
Defendant agrees that any additional time would necessarily toll the speedy Trial Act.

WHEREFORE, Defendant respectfully requests a continuance of his Motion cutoff date until July 6th, 2020.

Respectfully submitted this 15th day of June, 2020.

s/A. Philip Lomonaco
A. Philip Lomonaco, BPR#011579
800 S. Gay Street, Suite 1950
Knoxville, TN 37929
(865) 521-7422
(865) 521-7433 fax
apl@knox-law.com

CERTIFICATE OF SERVICE

I do hereby certify that a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by U. S. Mail. Parties may access this filing through the Court's electronic filing system.

s/A. Philip Lomonaco